

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

(1) GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-23-52-JAR
)	
(1) WAGNER & LYNCH, PLLC,)	
)	
Defendant.)	

JOINT STATUS DISCOVERY REPORT

The Parties respectfully submit this Joint Status Discovery Report as required under the Scheduling Order (Dkt. # 15) in this case. The categories and information detailed herein specifically address the topics listed by the Court in its Order. Dkt. # 15, p. 2.

1. The date written discovery was issued by each party:

Great Lakes issued written discovery requests to Wagner & Lynch on June 20, 2023. Likewise, Wagner & Lynch issued written discovery requests to Great Lakes on July 6, 2023.

2. The date written discovery was responded to by each party:

The dates for responses have not yet passed. The 30-day deadline for Wagner & Lynch's responses falls on July 20, 2023 and the 30-day deadline for Great Lakes responses falls on August 4, 2023.

3. The number of documents provided in discovery by each party:

None to date.

4. The names and dates of witnesses who have been deposed:

To date, no witnesses have been deposed, but depositions have been scheduled.

5. The names of all witnesses that remain to be deposed prior to the discovery cut off:

<u>Name</u>	<u>Date of Deposition</u>
Blake Lynch Wagner & Lynch	August 11, 2023
Keith Heaslet Superior Plumbing	July 28, 2023
Damon Thompson Flood Serv	Currently unscheduled
Casey Harvey Flood Serv	Currently unscheduled
Todd Nave BayTown Construction	Currently unscheduled
Nils Rauniker	Currently unscheduled
Randy Howard Defendant	Currently unscheduled
Corporate Representative Defendant	Currently unscheduled

6. A list of any subpoenas issued by each party and the number of documents obtained as a result of that subpoena:

<u>Issued to:</u>	<u>Number of Documents</u>
Baytown Construction	None
Superior Plumbing	None
FloodServ	9 documents (304 pages)
Nils Rauniker	None

7. Any discovery issues that should be brought to the court's attention at this time.

None by either party.

Read and Approved by:



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